

**GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL**

A Professional Corporation

660 New Road, Suite No. 1-A

Northfield, New Jersey 08225

(609) 646-0222 FAX (609) 646-0887

Attorneys for John Crabtree (59186-1)

BY: /s/ Francis J. Ballak
FRANCIS J. BALLAK (FJB2746)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE:	:	CHAPTER 11
	:	
ADAMAR OF NJ IN LIQUIDATION, LLC	:	
	:	CASE NO. 09-20711
	:	
	:	
<i>Debtors</i>	:	JUDGE: JUDITH H. WIZMUR

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

TO: See attached list.

PLEASE TAKE NOTICE that on **Monday, May 18, 2011 at 9:30 a.m.** in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorneys for the creditor, John Crabtree shall move before the United States Bankruptcy Court, at the Court House, Camden, New Jersey for an Order granting relief from the automatic stay to grant John Crabtree relief from the automatic stay to institute and prosecute to conclusion personal injury litigation in state court.

Movant shall rely upon the enclosed Statement of Counsel and the enclosed letter brief.

Movant requests oral argument in accordance with the local rules.

**GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL**
Attorneys for John Crabtree

/s/ Francis J. Ballak, Esquire
FRANCIS J. BALLAK, ESQUIRE

DATED: April 27, 2011

SERVICE LIST

Adamar of NJ in Liquidation, LLC f/k/a
Adamar of New Jersey, Inc. and Manchester Mall, Inc.
ATTN: Mark Giannantonio
Brighton Avenue and Boardwalk
Atlantic City, NJ 08401
Debtor

Gerald H. Gline, Esquire
Cole, Schotz, Meisel, Forman & Leonard
25 Main Street
Hackensack, NJ 07601
Atty for Debtor

Ilana Volkov, Esquire
Cole, Schotz, Meisel, Forman & Leonard
25 Main St.
Hackensack, NJ 07601
Atty for Debtor

Michael D. Sirota, Esquire
Cole, Schotz, Meisel, Forman & Leonard
25 Main St.
Hackensack, NJ 07601
Atty for Debtor

Ryan T. Jareck, Esquire
Cole, Schotz, Meisel, Forman & Leonard
25 Main Street
Court Plaza North
Hackensack, NJ 07601
Atty for Debtor

Jeffrey M. Sponder, Esquire
Office of U.S. Trustee
One Newark Center
Newark, NJ 07102

Michael J. Viscount, Jr., Esq
Fox Rothschild LLP
1301 Atlantic Ave
Atlantic City, NJ 08401